

[Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

WHB 318 v. Uber Technologies, Inc., et al.
Case No: 3:24-cv-04889

Case No. 3:23-md-03084-CRB (LJC)

**JOINT STIPULATION TO EXTEND THE
CASE SCHEDULE**

Judge: Hon. Charles R. Breyer
Courtroom: 6-17th Floor

Plaintiff WHB 318 and Defendants Uber Technologies, Inc., *et al.* (the “Parties”), by and through their undersigned counsel, stipulate and agree as follows:

WHEREAS, after adding WHB 318 to Trial Wave 1, the Court ordered the parties to propose a discovery schedule for that case. ECF 3706;

WHEREAS, the parties proposed that fact discovery in WHB 318 be substantially completed by November 3. ECF 3722; WHEREAS, the parties also agreed to stagger expert and other pretrial deadlines according to each Wave 1 trial date as they are assigned;

WHEREAS, the Parties are working to complete written discovery and fact depositions for WHB 318;

WHEREAS, the trial in Jalynn Dean v. Uber Techs., Inc. will begin on January 13, 2026 in Phoenix, Arizona. ECF 4425;

WHEREAS no additional cases have been assigned trial dates;

WHEREAS, the Parties need additional time to conduct a final corporate representative deposition and expert discovery, and request that the Court extend discovery and pretrial deadlines as set forth below;

WHEREAS, the Court granted the Parties joint stipulation to extend the case schedule. ECF 4437;

WHEREAS, the Parties have agreed to further modify the case deadlines by an additional month as set forth below;

WHEREAS the Parties further agree that nothing about this further stipulated extension will change the anticipated timing or order of upcoming trials.

NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED by the Parties to extend the case schedule as follows:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Expert Reports	December 19, 2025	January 16, 2025
End of Substantial Fact Discovery	Completed	Completed

Rebuttal Reports	January 16, 2025	February 13, 2026
Close of Discovery	January 30, 2025	February 27, 2026
Dispositive/Daubert Motions	February 13, 2026	March 13, 2026*
Oppositions	February 27, 2026	March 27, 2026*
Replies	March 6, 2026	April 6, 2026*
Trial Date	TBD	TBD

*The Parties agree to revisit whether the dispositive motion and Daubert briefing schedule should be extended or vacated in light of other trial settings.

DATED: December 4, 2025

By: /s/ Sejal Brahmhatt

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CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

/s/ Laura Vartain Horn

Laura Vartain Horn

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
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IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**[PROPOSED] ORDER GRANTING JOINT
STIPULATION TO EXTEND THE CASE
SCHEDULE**

This Document Relates to:

WHB 318 v. Uber Technologies, Inc., et al.
Case No: 3:24-cv-04889

Judge: Hon. Charles R. Breyer
Courtroom: 6-17th Floor

The Court hereby GRANTS the Parties' joint stipulation to extend the case schedule as follows:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Expert Reports	November 17, 2025	December 19, 2025
End of Substantial Fact Discovery	November 3, 2025	Completed
Rebuttal Reports	December 15, 2025	January 16, 2026
Close of Discovery	December 30, 2025	January 30, 2026
Dispositive/Daubert Motions	January 5, 2026	February 13, 2026
Oppositions	January 19, 2026	February 27, 2026
Replies	February 2, 2026	March 6, 2026
Trial Date	None	TBD

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____, 2025

HON. CHARLES R. BREYER
UNITED STATES DISTRICT COURT JUDGE